

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

THE ESTATE OF NENA CHARLEY,  
by and through Personal Representative,  
TIMOTHY CHARLEY, TIMOTHY  
CHARLEY, as parent and next friend of  
NILE CHARLEY, and TIMOTHY CHARLEY,  
Individually,

Plaintiffs,

vs.

Cause No. 1:22-cv-00033-JB-JFR

THE UNITED STATES OF AMERICA, ROBIN  
RANELL SALES, R.N., JOELLE CATHERIN  
CERO GO, R.N., AB STAFFING SOLUTIONS,  
LLC, a Foreign Corporation, NEXT MEDICAL  
STAFFING, a Foreign Corporation, and JOHN or  
JANE DOE Corporation.

Defendants.

**DEFENDANT THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS'  
MOTION FOR RELIEF BASED ON NEWLY DISCOVERED EVIDENCE REGARDING  
THE COURT'S RULING ON DEFENDANT NURSE SALES' AND NURSE GO'S  
MOTION FOR SUMMARY JUDGMENT**

Defendant the United States of America moves the Court for an extension of time of fourteen (14) days to file a Response to Plaintiffs' Motion for Relief Based on Newly Discovered Evidence Regarding the Court's Ruling on Defendant Nurse Sales' and Nurse Go's Motion for Summary Judgment (Doc. 272). Defendant requests that the current deadline of August 1, 2024 be extended to August 15, 2024.

Counsel for Plaintiffs was contacted and does not oppose this motion. The remaining named Defendants also do not oppose this motion.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ  
United States Attorney

/s/ Samantha E. Kelly 8/1/24  
SAMANTHA E. KELLY  
BRETT C. EATON  
Assistant United States Attorneys  
201 Third Street NW, Suite 900  
Albuquerque, NM 87102  
(505) 224-1455; Fax (505) 346-7205  
[Samantha.Kelly@usdoj.gov](mailto:Samantha.Kelly@usdoj.gov)  
[Brett.Eaton@usdoj.gov](mailto:Brett.Eaton@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that on August 1, 2024, I filed the foregoing electronically through the CM/ECF system which caused all counsel of record to be served by electronic means as more fully reflected on the Notice of Electronic Filing.

/s/ Samantha E. Kelly  
SAMANTHA E. KELLY  
Assistant United States Attorney